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May 18, 2022

Kent W. Sanborn  
USEPA Region 6 – Enforcement & Compliance Assurance Division  
P.O. Box #1495  
*Mail Code: ECDWE*  
Pawhuska, OK 74056

and

Guy Tidmore  
USEPA Region 6 – Enforcement & Compliance Assurance Division  
1201 Elm Street, Suite 500  
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Dallas, TX 75270

**Re: Request for Documents Related to Inspection by Kent W. Sanborn**

*McKeever v. G&C Petroleum*

*McKeever v. Special Energy Corporation*

District Court of Payne County, State of Oklahoma

Case No.: CJ-2021-424

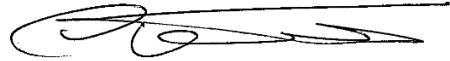
To Whom It May Concern,

We represent landowner Michael McKeever in the above-captioned lawsuits concerning saltwater spills that were discovered in Payne County, Oklahoma on the Ramsey Unit lease. On April 14, 2021, Kent W. Sanborn performed an inspection of the Ramsey Unit under the authority of the Clean Water Act. The United States Environmental Protection Agency Inspection Report electronically signed by Mr. Sanborn and his supervisor Guy Tidmore is attached for reference. Please consider this a request made pursuant to the Freedom of Information Act, 5 U.S.C. §552 for any and all documents related to brine discharges on the Ramsey Unit, including but not limited to:

- 1) Any and all related records
  - a. Pertaining to the EPA's response to the spill in the attached Inspection Report, including dates, and correspondence with third parties.
  - b. Involving email correspondence, phone conversations, notes, etc. pertaining to the saltwater spill; and
  - c. Pertaining to remedial actions taken
- 2) Any and all records regarding or pertaining to brine discharges on any units owned or operated by G&C Petroleum, Inc. in Payne County, Oklahoma separate from that referenced in the attached report
- 3) Any and all records regarding or pertaining to brine discharges on any units owned or operated by Special Energy Corporation in Payne County, Oklahoma separate from that referenced in the attached report
- 4) Any and all records and communications between G&C Petroleum, Inc. and the EPA regarding brine discharges on any unit owned or operated by G&C Petroleum, Inc.;
- 5) Any and all records and communications between Special Energy Corporation and the EPA regarding brine discharges on any unit owned or operated by Special Energy Corporation;
- 6) Any and all complaints filed against G&C Petroleum, Inc., records regarding EPA's findings with respect to each, and resulting disciplinary actions; and
- 7) Any and all complaints filed against Special Energy Corporation, records regarding EPA's findings with respect to each, and resulting disciplinary actions.
- 8) Any and all documents in the EPA's possession or control regarding any brine discharge on the Ramsey Unit from January 1, 2008 to present.

Thank you for your cooperation in this matter. Should you need any further information prior to processing this request, please feel free to contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to be 'C. William Threlkeld', with a long horizontal stroke extending to the right.

C. WILLIAM THRELKELD  
STERLING E. PRATT  
JAMES B. WILCOXEN  
STEVEN M. CROWLEY  
For the Firm